

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**VIRNETX INC. AND  
LEIDOS, INC.,**

**v.**

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**Civil Action No. 6:12-cv-855-RWS**

**APPLE INC.**

**[PROPOSED] VERDICT FORM**

In answering these questions, you are to follow all of the instructions provided by the Court during the Court's jury instructions. You must answer each question, and your answer to each question must be unanimous.

1. What royalty rate do you find, by a preponderance of the evidence, would fairly and reasonably compensate VirnetX for Apple's infringement?

\_\_\_\_\_ per device

2. VirnetX and Apple have stipulated that the total number of infringing units is 598,629,580. Multiplying the per-device royalty rate in Question 1 by this total number of units, what total royalty do you find, by a preponderance of the evidence, would fairly and reasonably compensate VirnetX for Apple's infringement?

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